

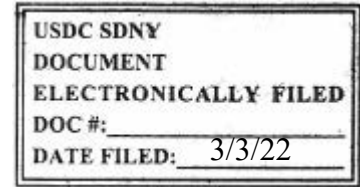


U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 2, 2022



By ECF

The Honorable Alison J. Nathan
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Alim v. United States*, No. 21-cv-2234 (AJN) (JEW)

Dear Judge Nathan:

This Office represents the Defendant United States of America (the “Government”) in the above-captioned matter brought pursuant to the Federal Tort Claims Act, 28 U.S.C. §§ 1346, 2671 *et seq.* On behalf of the Government, I write respectfully to request an adjournment of the post-discovery status conference scheduled for March 4, 2022, and the parties’ deadlines for submission of a joint status letter. (ECF No. 30).

The Government has requested an extension of the discovery deadlines in this matter, with Plaintiff’s consent, by letter motion to Magistrate Judge Willis. (ECF No. 31.) The requested deadline for the completion of fact discovery is March 16, 2022 (originally February 9, 2022), and the requested deadline for the completion of expert discovery is April 22, 2022 (originally March 14, 2022). The extension of these discovery deadlines is necessary to engage in expert discovery in this matter.

Accordingly, the Government requests an adjournment of the March 4, 2022 post-discovery status conference, and the deadline for the parties’ joint submission, to a date after the close of fact discovery convenient to the Court. This is the fourth request for an adjournment of the post-discovery status conference, and the first request for an extension of the deadline for the parties’ joint submission. Plaintiff’s counsel consents to this request.

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I thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

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cc: Plaintiff's Counsel (By ECF)

The post-discovery conference scheduled for March 4, 2022, is hereby adjourned to April 29, 2022, at 3:15 p.m. The parties' joint letter, as defined in the Court's order dated March 1, 2022, Dkt. No. 30, shall be filed by April 22, 2022.

SO ORDERED.

3/3/22

